

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CATHY SNYDER, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

BAOZUN INC., VINCENT WENBIN QIU
and ROBIN BIN LU,

Defendants.

Case No. 1:19-cv-11290-ALC

NOTICE OF MOTION OF THE BAOZUN
INVESTOR GROUP FOR
CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF, AND APPROVAL OF
LEAD COUNSEL

IVAR AUS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

BAOZUN INC., VINCENT WENBIN QIU,
and ROBIN BIN LU,

Defendants.

Case No. 1:19-cv-11812-UA

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Zheng Yan and Zhiyang Guo (together, the “Baozun Investor Group”), by and through their counsel, will and do hereby move this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for an Order: (1) consolidating the above-captioned actions; (2) appointing the Baozun Investor Group as Lead Plaintiff on behalf of a class consisting of all persons and entities other than the above-captioned defendants who purchased or otherwise acquired Baozun securities between March 6, 2019 and November 20, 2019, inclusive; and (3) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class.

Dated: February 10, 2020

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

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Counsel for Lead Plaintiff Movant the Baozun Investor Group and Proposed Lead Counsel for the Class